

SAO

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Attorneys for Plaintiff Handcrafted Distribution, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HANDCRAFTED DISTRIBUTION, LLC,

Plaintiff,

v.

KIRK V. OFFERLE, and
CONSTANCE M. CHAMBERS,

Defendants.

Case No. 2:16-cv-03035-RFB-CWH

**STIPULATION AND ORDER FOR
TEMPORARY RESTRAINING ORDER**

Plaintiff HANDCRAFTED DISTRIBUTION, LLC (“Handcrafted” or “Plaintiff”) and defendants KIRK V. OFFERLE (“Offerle”), and CONSTANCE M. CHAMBERS (“Chambers” collectively “Defendants”) by and through their respective undersigned counsel, hereby stipulate and agree as follows:

1. That Defendants stipulate to the entry of a temporary restraining order and preliminary injunction prohibiting and enjoining Defendants from selling (other than in the ordinary course of business), dissipating, disbursing, or disposing of the assets of Ciao Uva, LLC (“Ciao Uva”) or their membership interests in Ciao Uva, to any party other than Plaintiff;
2. That the parties will participate in an evidentiary hearing on Plaintiff’s Motion for Preliminary and Permanent Injunction, to be set 60-75 days from the date of this Stipulation. The temporary restraining order (TRO) and preliminary injunction (PI) will

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stay in effect until the conclusion of this evidentiary hearing or until the parties stipulate to vacate the TRO and PI.

3. From the date of entry of this stipulation through the conclusion of the evidentiary hearing or until the parties stipulate to vacate the TRO and PI, Defendants will continue to operate Ciao Uva in a commercially reasonable manner to protect, maintain, and preserve the value of Ciao Uva, as it is on this date, including its equipment, accounts, inventory, licenses, intellectual property, good will, and other assets;
4. That Defendants will be liable to Plaintiff for any violation of this Stipulation.
5. Plaintiff will be required to post a \$10,000.00 bond.

DATED this 13th day of January, 2017.

McDONALD CARANO WILSON LLP

/s/ Jeff Silvestri
Jeff Silvestri, Esq. (#5779)
Jason Sifers, Esq. (#14273)
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Attorneys for Plaintiff

DATED this 13th day of January, 2017.

HAWKINS MELENDREZ, P.C.

/s/ Martin I. Melendrez
Martin I. Melendrez, Esq. (#7818)
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Attorneys for Defendants

IT IS SO ORDERED.

DATED: January 18, 2017



RICHARD F. BOULWARE, II
United States District Court